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8 *Attorneys for Federal Defendants*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 CANA FOUNDATION, a non-profit corporation, LAURA LEIGH, individually, and WILD HORSE EDUCATION, a nonprofit corporation,

13 *Plaintiffs,*

14 v.

15 UNITED STATES DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT, and JON RABY, Nevada State Director of the Bureau of Land Management,

18 *Federal Defendants.*

19) **JOINT STATUS REPORT**

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20 Per the Court's Minute Order entered on December 16, 2024, Federal Defendants and
21 Plaintiffs submit this joint status report to address "whether this case needs to return to the
22 litigation track[.]" ECF No. 90.

23 As the parties have informed Judge Weksler, they have reached a settlement agreement
24 in principle to resolve the remaining claim in this case, which is subject to the resolution of
25 Plaintiffs' request for attorneys' fees and the review and approval of the appropriate officials at

the Bureau of Land Management and the United States Department of Justice.¹ Federal Defendants need additional time to evaluate Plaintiffs' fees request and to seek and obtain the necessary approvals for the settlement agreement in principle. In light of the upcoming holidays, Federal Defendants anticipate that they will be able to obtain the necessary approvals by January 13 and propose that the parties file another joint status report at that time.

Dated: December 20, 2024

Respectfully Submitted,

TODD KIM, Assistant Attorney General
United States Department of Justice
Environment and Natural Resources Division

/s/ Michelle M. Spatz

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¹ Federal Defendants do not currently have authorization to enter a settlement agreement. Accordingly, Federal Defendants do not waive any arguments or defenses regarding Plaintiffs' First Amendment claim, Plaintiffs' entitlement to recover attorneys' fees and costs, or the amount of any such fees and costs.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 20, 2024, I filed the foregoing Joint Status Report electronically through the CM/ECF system, which caused all parties or counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Michelle M. Spatz
Michelle M. Spatz
U.S. Department of Justice